RED ROCK GULLY STABILIZATION SCOPING COMMENTS

RESPONSE TO COMMENTS • 2/19/2020

On November 1, 2019 the Coconino National Forest mailed a scoping letter for the Red Rock Gully Stabilization Project to 112 individuals and organizations. In addition the project was forwarded to the Fossil Creek Working Team. The project was also listed on the Forest Schedule of Proposed Actions.

The Forest Service received a total of 5 inquiries and comments in response to the scoping effort (Table A). Al of the comments either requested additional information or indicated support for the project.

Table 1. Public comments received during the Red Rock Gully Stabilization Project scoping period

Commentor	Comment	Issues identified	Response
Sharon Masek Lopez	Is the project area just the piece east of the ranger district office, or are there are other areas that will be treated? If so, it would make a nice demo project, but hopefully the project is broader than that. I think it is great that RRRD is pursuing this erosion control activity. It is much needed. There are several places in the Carroll Canyon and Dry Creek watersheds that need attention. I hope they can be included in the planning process.	Scope of project	Mike Dechter directly responded to Ms. Masek-Lopez to inform her the project could be implemented throughout the Ranger District, where gully restoration is needed and the project design features are met.
Clark Root	Would you please add my email to your contact list for future communications?	Mailing list	Mr. Root has been kept on the project mailing list and his information was shared with the District NEPA coordinator for other projects in his area.
Richard and Peggy Spencer-Coen	Great work, your scoping document is our new teaching tool. Answers all the questions I usually get.	No issue	Comment supports project planning effort. No response needed.
Rob Nelson, Arizona Game and Fish Department	The Department approves of the decision to restore these degrading watercourses, as the proposed actions will improve habitat for wildlife, as well as hydrological functioning in these areas. The Department also appreciates the Forest's recognition of listed Mexican spotted owl and gartersnake critical habitat and the assertion that biologists will be consulted prior to work occurring in those areas.	No issue	Comment supports project planning effort. No response needed.

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Rob Nelson, Arizona Game and Fish Department	However, the letter (dated October 31, 2019) describing the work to be done does not specify where exactly the work would be carried out, and therefore we cannot know which other sensitive wildlife species could be affected by this proposal. In addition to the spotted owl and the two gartersnake species, several other federally listed species have proposed or final critical habitat in the Red Rock Ranger District: the southwestern willow flycatcher, spikedace, loach minnow, and yellow-billed cuckoo. There are also several additional sensitive fish species which, although they would likely benefit from the final outcome of this project, may be impacted while the work is being carried out. Therefore, the Department requests that the Forest consult with a Department biologist when work locations are identified, so that the Department may advise on a case-by-case basis whether any species of concern may be impacted and assist the Forest in mitigating any potential impacts.	Coordination	The project is broad in scope and when restoration activities are identified for a specific location, additional review will be conducted to note potential effects to sensitive, threatened, endangered, or candidate species and their habitat. A biological review for the project has prescribed a number of mitigations that would be applied based on the aforementioned project review. These include:
			
			• Restoration work in riparian areas with occupied habitat, critical habitat, or proposed critical habitat (West Fork, Oak Creek, Sheepshead, Spring Creek, Red Tank Draw, Wet Beaver Creek, Walker Creek, Beaver Creek, West Clear Creek, Fossil Creek, and the Verde River) need to be reviewed and approved prior to the implementation of on the ground activities by the District Wildlife Biologist and Forest Fisheries Biologist in order to avoid disturbing listed wildlife and fish species.
			• For uplands that are within proposed critical habitat for gartersnakes (600 feet from stream edges on West Fork, Oak Creek, Spring Creek, and the Verde River) or within Mexican spotted owl (MSO) Protected Activity Centers or MSO critical, work with the biologist to determine timing restrictions.
			• Restoration work in areas with limestone soils (particularly the Verde Valley Botanical Area and the gypsum hills east of Camp Verde) need to be reviewed and approved prior to the implementation of on the ground activities by the Forest Botanist or District Wildlife Biologist in order to avoid disturbing listed and sensitive plant species.
			• Ensure ahead of time that any agaves in the area are not sensitive domesticates.
			• All disturbed areas will be seeded with a native seed mix with species consistent with the potential natural vegetative community identified in the Terrestrial Ecosystem Survey of the Coconino National Forest. Revegetation and use of natural fiber erosion control matting as described above would protect disturbed areas from scour and erosion.
			• Ahead of implementation, conduct an invasive plant inventory. Should there be highly invasive plants present, work with weed program leaders on how to avoid/mitigate the risk of spreading invasives.
			• Best Management Practices as outlined in Appendix B of the “Final Environmental Impact Statement for Integrated Treatment of Noxious or Invasive Weeds” (USDA 2005) would be followed to incorporate weed prevention and control into the project. The following features will be incorporated into project implementation and monitoring:
			  • Any heavy equipment will be inspected and cleaned before entering treatment areas to prevent introduction of invasive weeds.
			  • Monitor and treat noxious or invasive weed populations following project implementation if infestations expand or if new noxious or invasive weeds are detected in the project area
			• Any access routes would be returned to a pre-construction condition upon completion of the restoration activities using soil scarification, seeding, and mulching.
			• Motorized use associated with restoration activities would be kept on designated and existing administrative routes except where needed for transport of materials and installation of channel structures, or other restoration-related activities.
			
			The Forest will also consult with the Arizona Game and Fish Department per your request when locations are identified to solicit potential advice to minimize potential impacts to wildlife and wildlife habitat.

Jeanmarie Haney, Haney Hydrologic	In cases of ephemeral channels, flow has often become intermittent following installation of erosion control structures. Laura Normon of the USGS in Tucson, Arizona, as documented outcomes from many of these projects. Overall, the methods described in this Red Rock District proposal appear appropriate.	No issue	Comment is in agreement with the proposed action.

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Jeanmarie Haney, Haney Hydrologic	I suggest that a relatively small-scale project be implemented first, to demonstrate methods, gain experience, develop a volunteer corps, and grow interest in this type of restoration in this region. I suggest monitoring be conducted prior to installation of structures, to document baseline conditions, and periodically after structure installation, to document outcomes. In all projects, pre- and post-implementation monitoring should be conducted, to ensure that outcomes from actions are documented and long-term maintenance is conducted as needed.	Implementation and monitoring	While the proposed action is written broadly to allow flexibility for restoration efforts should funding change. At this time, funding is fairly limited for gully restoration efforts and any efforts will incorporate volunteer resources. This may include education efforts including making an easily accessible location a demonstration area. We hope to demonstrate methods, gain experience, develop the skills of volunteers, and grow interest in this type of restoration. Monitoring efforts will be made to document conditions before and after treatments. Photomonitoring would be conducted before and periodically after placement of structures. In addition, monitoring of invasive species before and 2 years after implementation are included in the project design features.
Jeanmarie Haney, Haney Hydrologic	I also suggest that the entire Red Rock district be inventoried to determine the extent of gullying and erosion, and a prioritization process be applied to select additional areas for treatment. This will increase efficiency and ensure that the highest priority areas receive treatment in an appropriate timeframe.	Prioritization of implementation	We agree that additional inventory information and prioritization can help allow for restoration efforts to be more efficient. A main impetus for this project was to address watershed risks identified in the Watershed Condition Framework Assessment, which identifies factors affecting water quality throughout the 1.8 million acre Coconino National Forest and helps prioritize subwatersheds for restoration work. The Coconino National Forest in partnership with Friends of the Verde River Greenway is pursuing funding for development of a citizen science-based approach for inventorying areas of active gullying. We consider this citizen science approach one of several tools we would like to deploy that would allow detection and prioritization of treatment of areas of accelerated erosion across the RRRD.